



**Lewis
Baach
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Middlemiss**
PLLC

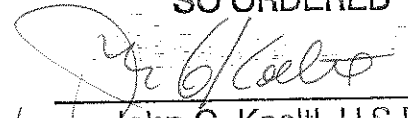
Arthur D. Middlemiss
212 822 0129
arthur.middlemiss@lbkmlaw.com

December 16, 2022

VIA ECF AND ELECTRONIC MAIL

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

APPLICATION GRANTED
SO ORDERED

12/16/22

John G. Koeltl, U.S.D.J.

Re: *United States v. Sean Wygovsky, 21-cr-00718 (JGK)*

Dear Judge Koeltl:


The defendant, Sean Wygovsky, by counsel, submits this letter seeking approval of a modification in Mr. Wygovsky's bail conditions to 1) remove his electronic ankle bracelet, and 2) permit travel to North Carolina so that he can visit his elderly parents. Mr. Wygovsky and his family now live in the U.S., and his children are attending school in the U.S. They live in Virginia.

Mr. Wygovsky's parents reside in Louisburg, North Carolina. Their health is deteriorating, and Mr. Wygovsky would like to be able to visit them to help with household chores and other necessary tasks.

We have discussed this matter with AUSA Daniel Tracer and Mr. Wygovsky's Pretrial Services Officer, Izlia Sanchez, and they consent to this modification of Mr. Wygovsky's bail conditions. Ms. Sanchez also reports that the supervising officer in Virginia, Officer Vakida Wilson, has no objections to the removal of Mr. Wygovsky's ankle bracelet.

As a result, we respectfully request that this Court order that Mr. Wygovsky's bail conditions be modified to permit the removal of his electronic ankle bracelet and travel to North Carolina.

Sincerely,


Arthur D. Middlemiss

Cc (via email):

AUSA Daniel Tracer
Izlia Sanchez (SDNY Pretrial Services Officer)
Courtney DeFeo (SDNY Pretrial Services Officer)
Vakida Wilson (Eastern District of Virginia Pretrial Services Officer)